

Questions on HSIA SOP for Personal Protection at CTC Manufacturing Sites

- The SOP states that goggles and work gloves are required anytime valves are operated and Figure 2 mentions nitrile gloves, which is consistent with some of the information provided during the risk evaluation process. Some work gloves do not offer chemical protection or offer limited protection. Are nitrile gloves the only gloves used?
 - Is there a specific standard (e.g. ASTM) that is used or the manufacturer uses to determine the type of gloves?
- How are the PPE selections modified when the chemical hazard involves a mixture of chemicals (compared to a single individual chlorinated solvent hazard)?
- The document states that gloves are donned before sampling and loading/unloading activities. In addition, we understand tasks take 5-30 mins. How many times are gloves reused and how is the number of re-uses calculated based on breakthrough time and other workplace factors? How are employees trained to recognize when a glove can no longer be reused?
 - If concentrations and amounts of accidental contact are minimal, how does the facility determine if the gloves should be replaced? Is it simply based on employee inspection of evidence? Have you considered using charcoal patch testing?
- Could you clarify what is entailed in the step “Extra PPE can be removed if conditions permit”?
- Do you use any tools in addition to gloves, such as glove bags, tongs, funnels, SafeTainers™, etc. for any of the tasks that may lead to contact with CTC? If not, have you considered these tools? If these tools are not helpful or feasible, could you explain why not?
- What circumstances trigger the need for the lower and the higher range of PPE when documentation suggests a range?
- The Waste Packaging SOP has a step for cleaning: “If the exterior of the drum is contaminated, clean the exterior of the drum.” Could you clarify how the drum is cleaned and what PPE is used during this step?
- We understand that the NESHAPs require management practices consisting of quarterly inspections for leaks. Are there any other additional inspections, for examples due to process changes or equipment updates, and, if so, how often do they occur?
- Upon entering the production area or designated process area, at what point do respirator use requirements take effect?
- What administrative controls (e.g. training, signs designating process areas, etc.) are in place to ensure SOP requirements are followed?